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Attorney for Emmanuel Nava

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
EMMANUEL NAVA and JOSE PEDRO
NAVA,
Defendants.

Case No.: 2:24-cr-00054-DJC

**STIPULATION REGARDING
EXCLUDABLE TIME PERIODS
UNDER SPEEDY TRIAL ACT AND
ORDER**

Date: August 15, 2024
Time: 9:00am
Judge: Hon Judge Daniel J. Calabretta

STIPULATION

1. By previous order, this matter was set for status on August 15, 2024.
2. By this stipulation, the defendants now move to continue the status conference until September 19, 2024, and to exclude time between August 15, 2024, and September 19, 2024 under Local Codes T2 and T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Counsel for the defendants desire additional time to review offers from the US Attorney's Office.

1 b) Counsel for the defendants believe that failure to grant the above-requested
2 continuance would deny them the reasonable time necessary for effective
3 preparation, taking into account the exercise of due diligence.
4 c) The government does not object to the continuance.
5 d) Based on the above-stated findings, the ends of justice served by continuing
6 the case as requested outweigh the interest of the public and the defendant in a
7 trial within the original date prescribed by the Speedy Trial Act.
8 e) For the purpose of computing time under the Speedy Trial Act, 18
9 U.S.C. § 3161, et seq., within which trial must commence, the time period of
10 August 15, 2024 to September 19, 2024, inclusive, is deemed excludable
11 pursuant to 18 U.S.C. § 3161(h)(7)(A), B(ii), (iv) [Local Code T2 and T4]
12 because this is a complex case and it results from a continuance granted by the
13 Court at defendant's request on the basis of the Court's finding that the ends of
14 justice served by taking such action outweigh the best interest of the public and
15 the defendant in a speedy trial.
16 4. Nothing in this stipulation and order shall preclude a finding that other provisions
17 of the Speedy Trial Act dictate that additional time periods are excludable from
18 the period within which a trial must commence.

19
20 **IT IS SO STIPULATED.**

21
22 DATED: August 12, 2024

PHILLIP A. TALBERT
United States Attorney

23
24 /s/ Cameron Desmond
25 CAMERON DESMOND
26 Assistant U.S. Attorney
27
28

1 DATED: August 12, 2024

PHILLIP A. TALBERT
United States Attorney

6 DATE: August 12, 2024

/s/ Emily Sauvageau
EMILY SAUVAGEAU
Assistant U.S. Attorney

10 DATE: August 12, 2024

/s/ Thomas A. Johnson
THOMAS A. JOHNSON
Attorney for Emmanuel Nava

11 DATE: August 12, 2024

/s/ Neat Allen Sawyer
NEAT ALLEN SAWYER
Attorney for Jose Pedro Nava

19 **ORDER**

21 IT IS SO FOUND AND ORDERED this 12th day of August 2024.

23
24 /s/ Daniel J. Calabretta
25 THE HONORABLE DANIEL J. CALABRETTA
26 UNITED STATES DISTRICT JUDGE